BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL MATE TOWNERS OF OFFICE OF THE GOOD STREET

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

MOTION FOR LATE ACCEPTANCE OF RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE REDIRECTED FROM WITNESS PATELUNAS (OCA/USPS-ST44-43 and 44)

The United States Postal Service hereby moves for late acceptance of Response of United States Postal Service to Interrogatories of the Office of the Consumer Advocate Redirected from Witness Patelunas (OCA/USPS-ST44-43 and 44).

The responses should have been filed on Friday, August 4, 2000. They are thus eight business days late. This delay was caused by the time needed to coordinate among various functional groups, as well as the press both of responding to numerous interrogatories and questions raised in technical conferences and hearings concerning the Postal Service's response to Order No. 1294, and of preparing rebuttal testimony. The Postal Service regrets any inconvenience.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Susan M. Duchek

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2990 Fax –5402 August 16, 2000

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Susan M. Duchek

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2990 Fax –5402 August 16, 2000